

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO.

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and
AMAZON.COM, INC.,

Defendants.

NOTICE OF REMOVAL

Defendant, LUIS MANUEL MISPIRETA (“MISPIRETA” or Defendant), files this Notice of Removal to remove the foregoing cause to the United States District court for the Southern District of Florida, Fort Lauderdale Division, and respectfully shows this Court the following:

I. GROUND FOR REMOVAL

This Notice of Removal is based on diversity jurisdiction pursuant to 28 U.S.C. §1332 et seq.

II. BASIS FOR DIVERSITY JURISDICTION

1. Plaintiff, LUIS CARLOS CORTINA (“Plaintiff”), commenced this action in the 17th Circuit Court in and for Broward County, Florida styled LUIS CARLOS CORTINA v. LUIS MANUEL MISPIRETA and AMAZON.COM, INC., CASE NO.: CACE-21-019815. Attached as Exhibit “1” is a true and correct copy of the Complaint.

2. AMAZON.COM, INC. was served with the Complaint on or about November 3, 2021.

3. MISPIRETA was never served with the Summons or Complaint. On April 1, 2022, counsel accepted service of the Complaint on behalf of MISPIRETA and entered a notice of appearance on MISPIRETA's behalf. Thus, service on MISPIRETA was effected on April 1, 2022.

4. The Complaint alleges that this cause of action arises out of an alleged automobile collision. In pertinent part, the Complaint states that on or about August 16, 2020, the Plaintiff and Defendant were involved in an automobile accident in Davie, Broward County, Florida.

5. Defendant, MISPIRETA, is seeking removal of this action to the Southern District of Florida, Fort Lauderdale Division, the District in which the action is now pending.

6. This Notice is filed within thirty (30) days of the date that MISPIRETA was served with the Complaint and/or determined that the action was removable. Therefore, this Notice of Removal is filed in compliance with 28 U.S.C. §1446(b).

7. Following the filing of this Notice of Removal with this Court, written notice of filing of same will be provided to the attorney for Plaintiff as required by law.

8. Following the filing of this Notice with this Court, a true and correct copy of the same will be filed with the Clerk of the Court of the 17th Judicial Circuit in and for Broward County, Florida, as required by law.

9. Attached hereto as Exhibit "2" are copies of all process, pleadings, and other papers filed in State Court.

10. This Court has removal jurisdiction of this action under the provisions of Title 28 of the United States Code § 1441(a). This Court has original jurisdiction of this action under the provisions of Title 28 of the United States Code § 1332.

11. Codefendant, AMAZON.COM, INC., consents to the removal of this action.

12. The Complaint states that the Plaintiff is seeking damages in excess of the jurisdictional limits of the Circuit Court. The damages available to the Plaintiff, if he prevails, are not limited in any fashion according to the pleading and Plaintiff alleges that as a result of the incident and alleged negligence of Defendants that he suffered bodily injuries, pain and suffering, disability, mental anguish, loss of capacity for enjoyment of life, expense of hospitalization, medical and nursing care, loss of income, and loss of ability to earn money. Moreover, the Plaintiff alleges that his injuries are permanent and continuing.

13. To date, the medical expenses allegedly incurred by the Plaintiff well exceed the jurisdictional threshold of this court, i.e. the damages alleged are well in excess of \$75,000.00.

14. Plaintiff alleges that he has incurred approximately \$466,000.00 in medical expenses. In addition to this and as noted above, the Plaintiff is claiming the need for future treatment and seeking to recover for pain and suffering, among other things. The jurisdictional threshold for diversity jurisdiction is thus satisfied.

15. More specifically, the Plaintiff has put into controversy the following medical bills and claims the same are related to the alleged collision:

- a. Precision Medical Products: \$4,250.00
- b. Central Palm Beach Surgery Center: \$177,776.00
- c. Associates MD Medical Group: \$5,114.88
- d. Ramon Vazquez Jr MDPA: \$72,000.00
- e. Doral Medical Imaging: \$3,170.00
- f. Dr. Zachary Menegakis: \$14,580.00
- g. BBO Spine and Orthopedic Specialists of S. Florida: \$170,462.80
- h. COR Interventional Medicine: \$550.00

- i. COR Injury Centers of Hollywood: \$13,739.00
- j. CMI Open MRI of Planation: \$5,550.00

16. Accordingly, the damages alleged and put in controversy by the Plaintiff exceed \$75,000.00, exclusive of interest and costs. See Plaintiff's Answers to Interrogatories dated April 2022 attached hereto as Exhibit "3."

17. Plaintiff is a citizen of Florida. Defendant, AMAZON.COM, Inc. is a Delaware corporation and has its principal place of business in Seattle, Washington. AMAZON.COM, INC. is thus a citizen of Delaware and Washington for purposes of diversity jurisdiction. Defendant, MISPIRETA, is a natural person and is a citizen of North Carolina. See Declaration of MISPIRETA attached hereto as Exhibit "4."

18. Accordingly, there is complete diversity of citizenship between the actual and real parties, the requirements of 28 U.S.C 1441(b) have been met since the Defendants are not citizens of Florida, the State in which the action was brought. Thus, this Court has removal jurisdiction on the fact of the Complaint based upon diversity of citizenship.

III. CONCLUSION

The amount in controversy exceeds \$75,000.00, exclusive of interest and costs. Complete diversity exists as Plaintiff is a citizen of Florida and Defendants are citizens of Washington, Delaware, and North Carolina, respectively. Accordingly, Defendant, MISPIRETA, respectfully request that this action proceed in this Court as an action properly removed pursuant to 28 U.S.C. 1332, *et seq.*, and 28 U.S.C. 1441, *et seq.*

[THE REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 28th day of April, 2022, a true and correct copy of the above and foregoing document was filed with the Clerk of the above styled Court using eFiling Portal. We also certify that the foregoing document was served this day on all counsel of record or pro se parties identified on the attached Service List via electronic mail or in some other authorized manner for those counsel or parties who are not authorized to receive filings by electronic mail.

Respectfully submitted,

***WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP***
*Counsel for Defendants, Amazon.com, Inc.
and Luis Manuel Mispireta*
100 SE Second Street, Suite 2100
Miami, Florida 33131
Telephone: 305-374-4400
Facsimile: 305-579-0261

By: /s/ Gerard Di Popolo
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anthony.strasius@wilsonelser.com
Gerard Di Popolo
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gerard.dipopolo@wilsonelser.com

SERVICE LIST

Jordan Kirby, Esq.
Florida Bar No.: 67217
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Plantation, Florida 33324
Tel: 305-661-6000
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EXHIBIT “A”

Filing # 137654470 E-Filed 11/01/2021 03:11:23 PM

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.:

COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

The Plaintiff, **LUIS CARLOS CORTINA**, by and through the undersigned counsel, sues the Defendants, **LUIS MANUEL MISPIRETA and AMAZON.COM, INC.**, and alleges as follows:

1. That this is an action for damages in excess of thirty thousand dollars (\$30,000.00), exclusive of interest and costs, and otherwise within the jurisdictional limits of this Court.

2. At all times material hereto, the Plaintiff, **LUIS CARLOS CORTINA**, was and is a resident of Broward County, Florida, and is otherwise *sui juris*.

3. At all times material hereto, the Defendant, **LUIS MANUEL MISPIRETA**, was and is a resident of Miami-Dade County, Florida, and is otherwise *sui juris*.

4. At all times material hereto, the Defendant, **AMAZON.COM, INC.**, was and is a Foreign Profit Corporation actively doing business in Broward County, Florida.

5. At all times material hereto, and specifically on August 16, 2020, the Defendant, **LUIS MANUEL MISPIRETA**, was the owner and operator of a 2016 Toyota motor vehicle bearing Florida license plate number KFYE83 and VIN number 2T1BURHE4GC555891, pulling out of a

private driveway near 7350 SW 39th Street, attempting to enter westbound SW 39th Street by making a left hand turn in Davie, Broward County, Florida.

6. At all times material hereto, and specifically on August 16, 2020, the Plaintiff, **LUIS CARLOS CORTINA**, was operating his 2003 GMC motor vehicle bearing Florida license plate number JREC24 and VIN number 1GKEC16Z93J164553, traveling westbound on SW 39th Street in Davie, Broward County, Florida, when the Defendant made a left hand turn in front of Plaintiff causing a collision.

7. Venue is proper in this County in that all of the acts complained of herein occurred in Broward County, Florida.

COUNT I – PLAINTIFF’S NEGLIGENCE CLAIM AGAINST DEFENDANT, LUIS MANUEL MISPIRETA

8. At all times material hereto, Defendant, **LUIS MANUEL MISPIRETA**, had a duty to operate and/or maintain the motor vehicle he was driving in a safe and reasonable manner and to keep control of the motor vehicle so that the vehicle would not collide with any other vehicles.

9. That on August 16, 2020, Defendant, **LUIS MANUEL MISPIRETA**, negligently operated and/or maintained his motor vehicle when he made a left hand turn in front of the Plaintiff, thereby causing a collision.

10. As a direct and proximate result of the negligence of Defendant, **LUIS MANUEL MISPIRETA**, the Plaintiff, **LUIS CARLOS CORTINA**, suffered significant and severe bodily injury that is permanent within a reasonable degree of medical probability, along with resulting pain and suffering, disability, disfigurement, physical impairment, inconvenience, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings and loss of ability to earn money in the future, and/or aggravation of

a previously existing condition. These losses are either permanent or continuing in nature, and the Plaintiff, **LUIS CARLOS CORTINA**, will suffer these losses into the future.

WHEREFORE, the Plaintiff, **LUIS CARLOS CORTINA**, respectfully demands judgment against Defendant, **LUIS MANUEL MISPIRETA**, for damages, costs, and interest and all other relief this Court deems just and appropriate.

COUNT II – PLAINTIFF’S VICARIOUS LIABILITY CLAIM
AGAINST DEFENDANT, AMAZON.COM, INC.

11. At all times material hereto, Defendant, **LUIS MANUEL MISPIRETA**, had a duty to operate and/or maintain the motor vehicle he was driving in a safe and reasonable manner and to keep control of the motor vehicle so that the vehicle would not collide with any other vehicles.

12. That on August 16, 2020, Defendant, **LUIS MANUEL MISPIRETA**, negligently operated and/or maintained his motor vehicle when he made a left hand turn in front of the Plaintiff, thereby causing a collision.

13. At all times material hereto, and specifically on August 16, 2020, the Defendant, **LUIS MANUEL MISPIRETA**, was an agent, officer, servant, and/or employee of the Defendant, **AMAZON.COM, INC.**

14. At all times material hereto, and specifically on August 16, 2020, the Defendant, **LUIS MANUEL MISPIRETA**, was maintaining and/or operating the aforementioned motor vehicle while in the course and scope of his employment and/or agency with Defendant, **AMAZON.COM, INC.**

15. Defendant, **AMAZON.COM, INC.**, is vicariously liable for the negligent acts and/or omissions of its agent, officer, servant and/or employee, Defendant, **LUIS MANUEL MISPIRETA**, while he was operating and/or maintaining the aforementioned motor vehicle while in the course

and scope of his employment and/or agency under the doctrine of respondeat superior and/or agency.

16. As a direct and proximate result of the negligence of Defendant, **LUIS MANUEL MISPIRETA**, and the resulting vicarious liability of Defendant, **AMAZON.COM, INC.**, the Plaintiff, **LUIS CARLOS CORTINA**, suffered significant and severe bodily injury that is permanent within a reasonable degree of medical probability, along with resulting pain and suffering, disability, disfigurement, physical impairment, inconvenience, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings and loss of ability to earn money in the future, and/or aggravation of a previously existing condition. These losses are either permanent or continuing in nature, and the Plaintiff, **LUIS CARLOS CORTINA**, will suffer these losses into the future.

WHEREFORE, the Plaintiff, **LUIS CARLOS CORTINA**, respectfully demands judgment against Defendant, **AMAZON.COM, INC.**, for damages, costs, and interest and all other relief this Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiff, **LUIS CARLOS CORTINA**, further demands a trial by jury on all issues so triable as of right by jury.

Dated: _____

RUBENSTEIN LAW, P.A.
Attorneys for Plaintiff
261 N. University Drive, Suite 700
Plantation, FL 33324
Tel: (305) 661-6000
Fax: (305) 771-0361
Email: jkirby@rubensteinlaw.com
atello@rubensteinlaw.com

eservice@rubensteinlaw.com

By: /s/Jordan M. Kirby
Jordan M. Kirby, Esq.
Florida Bar No.: 67217

COMPOSITE EXHIBIT “B”

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT/COUNTY COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

Luis Carlos Cortina
Plaintiff

Case # _____
Judge _____

vs.

Luis Manuel Mispireta, AMAZON.COM, INC.
Defendant

II. AMOUNT OF CLAIM

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- ☐ \$8,000 or less
☐ \$8,001 - \$30,000
☐ \$30,001- \$50,000
☐ \$50,001- \$75,000
☐ \$75,001 - \$100,000
☒ over \$100,000.00

III. TYPE OF CASE (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

CIRCUIT CIVIL

- ☐ Condominium
- ☐ Contracts and indebtedness
- ☐ Eminent domain
- ☒ Auto negligence
- ☐ Negligence—other
 - ☐ Business governance
 - ☐ Business torts
 - ☐ Environmental/Toxic tort
 - ☐ Third party indemnification
 - ☐ Construction defect
 - ☐ Mass tort
 - ☐ Negligent security
 - ☐ Nursing home negligence
 - ☐ Premises liability—commercial
 - ☐ Premises liability—residential
- ☐ Products liability
- ☐ Real Property/Mortgage foreclosure
 - ☐ Commercial foreclosure
 - ☐ Homestead residential foreclosure
 - ☐ Non-homestead residential foreclosure
 - ☐ Other real property actions
- ☐ Professional malpractice
 - ☐ Malpractice—business
 - ☐ Malpractice—medical
 - ☐ Malpractice—other professional
- ☐ Other
 - ☐ Antitrust/Trade regulation
 - ☐ Business transactions
 - ☐ Constitutional challenge—statute or ordinance
 - ☐ Constitutional challenge—proposed amendment
 - ☐ Corporate trusts
 - ☐ Discrimination—employment or other
 - ☐ Insurance claims
 - ☐ Intellectual property
 - ☐ Libel/Slander
 - ☐ Shareholder derivative action
 - ☐ Securities litigation
 - ☐ Trade secrets
 - ☐ Trust litigation

COUNTY CIVIL

- ☐ Small Claims up to \$8,000
- ☐ Civil
- ☐ Real property/Mortgage foreclosure

- ☐ Replevins
- ☐ Evictions
 - ☐ Residential Evictions
 - ☐ Non-residential Evictions
- ☐ Other civil (non-monetary)

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes ☐ No ☒

IV. REMEDIES SOUGHT (check all that apply):

- ☒ Monetary;
- ☐ Nonmonetary declaratory or injunctive relief;
- ☐ Punitive

V. NUMBER OF CAUSES OF ACTION: []
(Specify)

2

VI. IS THIS CASE A CLASS ACTION LAWSUIT?

- ☐ yes
- ☒ no

VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- ☒ no
- ☐ yes If "yes," list all related cases by name, case number, and court.

VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- ☒ yes
- ☐ no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Jordan M. Kirby Esq.
Attorney or party

Fla. Bar # 67217
(Bar # if attorney)

Jordan M. Kirby Esq.
(type or print name)

11/01/2021
Date

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

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Defendants.

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2. At all times material hereto, the Plaintiff, **LUIS CARLOS CORTINA**, was and is a resident of Broward County, Florida, and is otherwise *sui juris*.

3. At all times material hereto, the Defendant, **LUIS MANUEL MISPIRETA**, was and is a resident of Miami-Dade County, Florida, and is otherwise *sui juris*.

4. At all times material hereto, the Defendant, **AMAZON.COM, INC.**, was and is a Foreign Profit Corporation actively doing business in Broward County, Florida.

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private driveway near 7350 SW 39th Street, attempting to enter westbound SW 39th Street by making a left hand turn in Davie, Broward County, Florida.

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9. That on August 16, 2020, Defendant, **LUIS MANUEL MISPIRETA**, negligently operated and/or maintained his motor vehicle when he made a left hand turn in front of the Plaintiff, thereby causing a collision.

10. As a direct and proximate result of the negligence of Defendant, **LUIS MANUEL MISPIRETA**, the Plaintiff, **LUIS CARLOS CORTINA**, suffered significant and severe bodily injury that is permanent within a reasonable degree of medical probability, along with resulting pain and suffering, disability, disfigurement, physical impairment, inconvenience, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings and loss of ability to earn money in the future, and/or aggravation of

a previously existing condition. These losses are either permanent or continuing in nature, and the Plaintiff, **LUIS CARLOS CORTINA**, will suffer these losses into the future.

WHEREFORE, the Plaintiff, **LUIS CARLOS CORTINA**, respectfully demands judgment against Defendant, **LUIS MANUEL MISPIRETA**, for damages, costs, and interest and all other relief this Court deems just and appropriate.

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AGAINST DEFENDANT, AMAZON.COM, INC.

11. At all times material hereto, Defendant, **LUIS MANUEL MISPIRETA**, had a duty to operate and/or maintain the motor vehicle he was driving in a safe and reasonable manner and to keep control of the motor vehicle so that the vehicle would not collide with any other vehicles.

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13. At all times material hereto, and specifically on August 16, 2020, the Defendant, **LUIS MANUEL MISPIRETA**, was an agent, officer, servant, and/or employee of the Defendant, **AMAZON.COM, INC.**

14. At all times material hereto, and specifically on August 16, 2020, the Defendant, **LUIS MANUEL MISPIRETA**, was maintaining and/or operating the aforementioned motor vehicle while in the course and scope of his employment and/or agency with Defendant, **AMAZON.COM, INC.**

15. Defendant, **AMAZON.COM, INC.**, is vicariously liable for the negligent acts and/or omissions of its agent, officer, servant and/or employee, Defendant, **LUIS MANUEL MISPIRETA**, while he was operating and/or maintaining the aforementioned motor vehicle while in the course

and scope of his employment and/or agency under the doctrine of respondeat superior and/or agency.

16. As a direct and proximate result of the negligence of Defendant, **LUIS MANUEL MISPIRETA**, and the resulting vicarious liability of Defendant, **AMAZON.COM, INC.**, the Plaintiff, **LUIS CARLOS CORTINA**, suffered significant and severe bodily injury that is permanent within a reasonable degree of medical probability, along with resulting pain and suffering, disability, disfigurement, physical impairment, inconvenience, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings and loss of ability to earn money in the future, and/or aggravation of a previously existing condition. These losses are either permanent or continuing in nature, and the Plaintiff, **LUIS CARLOS CORTINA**, will suffer these losses into the future.

WHEREFORE, the Plaintiff, **LUIS CARLOS CORTINA**, respectfully demands judgment against Defendant, **AMAZON.COM, INC.**, for damages, costs, and interest and all other relief this Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiff, **LUIS CARLOS CORTINA**, further demands a trial by jury on all issues so triable as of right by jury.

Dated: _____

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff

261 N. University Drive, Suite 700

Plantation, FL 33324

Tel: (305) 661-6000

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Email: jkirby@rubensteinlaw.com

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eservice@rubensteinlaw.com

By: /s/Jordan M. Kirby
Jordan M. Kirby, Esq.
Florida Bar No.: 67217

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NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY
NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiffs,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

Defendants.

PLAINTIFF'S NOTICE OF DESIGNATION OF PRIMARY AND SECONDARY E-MAIL ADDRESSES

PLEASE BE ADVISED that the Plaintiff, **Luis Carlos Cortina**, by and through the undersigned counsel, in accordance with Florida Rule of Civil Procedure 1.080 and Florida Rule of Judicial Administration 2.516, hereby designates undersigned counsel's primary and secondary electronic mail addresses in the above-styled action, and respectfully requests that copies of all orders, process, pleadings, and other documents filed or served in this matter be served at the primary and secondary e-mail addresses listed below, with such service e-mail complying with Rule 2.516(b)(1)(E).

Primary: jkirby@rubensteinlaw.com
Secondary: atello@rubensteinlaw.com
eservice@rubensteinlaw.com

Dated this ____ day of November, 2021.

RUBENSTEIN LAW, P.A.
Attorneys for Plaintiff
261 N. University Drive, Suite 700
Plantation, FL 33324
Tel: (305) 661-6000
Fax: (305) 670-7555

Email: jkirby@rubensteinlaw.com
atello@rubensteinlaw.com
eservice@rubensteinlaw.com

By: /s/ Jordan Kirby

JORDAN KIRBY

Florida Bar No.: 67217

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.:

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the COMPLAINT, INTERROGATORIES, REQUEST FOR PRODUCTION, AND EMAIL DESIGNATION in this action on Defendant:

**AMAZON.COM, INC.
c/o CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE, FL 32301**

Each Defendant is required to serve written defenses to the Complaint on Plaintiff's Attorney, to wit:

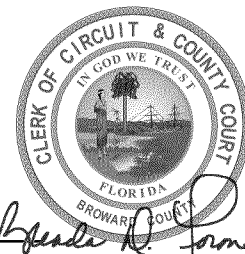
Jordan Kirby, Esquire
RUBENSTEIN LAW, P.A
261 N. University Drive, Suite 700
Plantation, FL 33324
Tel: (305) 661-6000 / Fax: (305) 670-7555

within 20 days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on Plaintiffs' attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED ON: on this on this ____ day of _____ **NOV 02 2021**

Clerk of Said Court

BY: _____
As Deputy Clerk



BRENDA D. FORMAN

(Court Seal)

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court and also, a default will be entered against that Defendant for the relief demanded in the Complaint or Petition. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.:

_____ /

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the COMPLAINT, INTERROGATORIES, REQUEST FOR PRODUCTION, AND EMAIL DESIGNATION in this action on Defendant:

**LUIS MANUEL MISPIRETA
20520 Highland Lakes Boulevard
Miami, FL 33179**

Each Defendant is required to serve written defenses to the Complaint on Plaintiff's Attorney, to wit:

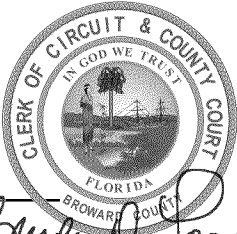
Jordan Kirby, Esquire
RUBENSTEIN LAW, P.A
261 N. University Drive, Suite 700
Plantation, FL 33324
Tel: (305) 661-6000 / Fax: (305) 670-7555

within 20 days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on Plaintiffs' attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED ON: on this on this ____ day of _____ NOV 02 2021

Clerk of Said Court

BY: _____
As Deputy Clerk
(Court Seal)


BRENDA D. FORMAN

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court and also, a default will be entered against that Defendant for the relief demanded in the Complaint or Petition. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.:

PLAINTIFF'S REQUEST FOR PRODUCTION TO DEFENDANT

The Plaintiff, **Luis Carlos Cortina**, by and through the undersigned attorneys, hereby requests the Defendant, **Luis Manuel Mispireta**, produce for inspection and/or photocopying within forty-five (45) days from the date of service of this request, pursuant to Florida Rule of Civil Procedure 1.350, at RUBENSTEIN LAW, P.A., 9130 S. Dadeland Blvd, PH, Miami, FL 33156, the following:

1. Any photographs (in color) taken by or on behalf of the Defendant that relate to the parties, individuals and/or vehicles involved, and the scene of the alleged occurrence.
2. Any and all statements (in any format, written or oral) of any person (party or non-party) revealing knowledge of facts relevant and material to the claims and defenses in the instant litigation.
3. Any and all insurance policies providing benefits or coverage to the Defendant for any claims injury or damage and the claim forms and records related to same for the subject incident or occurrence.
4. Any and all records reflecting the ownership, call logs, data usage, and/or text usage of any cellular telephone that you had in your possession or at your disposal at the time of this incident.
5. Any and all photographs (in color) of vehicle damage that was sustained by the Plaintiff or the Defendant on August 16, 2020.

6. Any and all data collected by any electronic data recording device that was operational in your vehicle at the time of the collision which occurred on August 16, 2020.
7. Any and all video tapes of the vehicles involved, individuals involved, and area where the collision occurred taken on August 16, 2020.
8. Any and all bills and/or estimates (including supplemental estimates) for repair to your vehicle or to the Plaintiff's vehicle as a result of the subject incident.
9. Any and all contracts including any indemnity agreements between **Luis Manuel Mispireta** and any third parties responsible for the operation of the vehicle that you were operating on August 16, 2020.
10. Any and all photographs, diagrams, charts or drawings pertaining to and acquired by the Defendant, as an alleged result of the collision giving rise to this suit.
11. Any and all photographs (in color) and/or video recording of the Plaintiff, resulting from surveillance and/or investigation of the Plaintiff.
12. Any transcript from traffic Court or any other Court involving the subject matter of the instant litigation and/or present name, address and telephone number of the court reporter present at said court.
13. Clear and legible copy of the Defendant's driver's license.
14. Clear and legible copy of motor vehicle registration of the motor vehicle operated by the Defendant at the time of the collision which is the subject matter of this lawsuit.

I HEREBY CERTIFY that a true and correct copy of the foregoing was attached to the Complaint and Summons and served to the Defendant, **Luis Manuel Mispireta**.

Dated: _____

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff

9130 S. Dadeland Blvd, PH

Miami, FL 33156

Tel: (305) 661-6000

Fax: (305) 771-0361

Email: jkirby@rubensteinlaw.com

atello@rubensteinlaw.com

eservice@rubensteinlaw.com

By: /s/ Jordan Kirby

Jordan Kirby

Florida Bar No.: 67217

NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY
NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY
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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.:

PLAINTIFF'S NOTICE OF SERVING INTERROGATORIES TO DEFENDANT

The Plaintiff, Luis Carlos Cortina, by and through the undersigned attorney, hereby gives notice of propounding Plaintiff's Interrogatories upon the Defendant, Luis Manuel Mispireta, to be answered within forty five (45) days from the date of service pursuant to Florida Rule of Civil Procedure 1.340.

I HEREBY CERTIFY that a true and correct copy of the foregoing was attached to the Complaint and Summons and served to the Defendant, Luis Manuel Mispireta.

Dated: _____

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff

9130 S. Dadeland Blvd, PH

Miami, FL 33156

Tel: (305) 661-6000

Fax: (305) 771-0361

Email: jkirby@rubensteinlaw.com

atello@rubensteinlaw.com

eservice@rubensteinlaw.com

By: /s/ Jordan Kirby

Jordan Kirby

Florida Bar No.: 67217

PLAINTIFF'S INTERROGATORIES TO DEFENDANT

(If answering for another person or entity, answer with respect to that person or entity, unless otherwise stated.)

1. What is the name and address of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?
2. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your Social Security number, and your date of birth.
3. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of 1 year, or that involved dishonesty or a false statement regardless of the punishment? If so, state as to each conviction, the specific crime and the date and place of conviction.
4. Describe any and all policies of insurance which you contend cover or may cover you for the allegations set forth in plaintiff's complaint, detailing as to such policies the name of the insurer, the number of the policy, the effective dates of the policy, the available limits of liability, and the name and address of the custodian of the policy.
5. Describe in detail how the incident described in the complaint happened, including all actions taken by you to prevent the incident.
6. Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question.
7. Identify where you were and describe what you were doing in the two (2) hours before the subject incident.
8. State the facts upon which you rely for each affirmative defense in your answer.
9. Do you contend any person or entity other than you is, or may be, liable in whole or part for the claims asserted against you in this lawsuit? If so, state the full name and address of each such person or entity, the legal basis for your contention, the facts or evidence upon which your contention is based, and whether or not you have notified each such person or entity of your contention.

10. Were you charged with any violation of law (including any regulations or ordinances) arising out of the incident described in the complaint? If so, what was the nature of the charge; what plea or answer, if any, did you enter to the charge; what court or agency heard the charge; was any written report prepared by anyone regarding the charge, and, if so, what is the name and address of the person or entity who prepared the report; do you have a copy of the report; and was the testimony at any trial, hearing, or other proceeding on the charge recorded in any manner, and, if so, what is the name and address of the person who recorded the testimony?
11. List the names and addresses of all persons who are believed or known by you, your agents, or your attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.
12. Have you heard or do you know about any statement or remark made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name and address of each person who made the statement or statements, the name and address of each person who heard it, and the date, time, place, and substance of each statement.
13. State the name and address of every person known to you, your agents, or your attorneys who has knowledge about, or possession, custody, or control of, any model, plat, map, drawing, motion picture, videotape, or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what item such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.
14. Do you intend to call any expert witnesses at the trial of this case? If so, state as to each such witness the name and business address of the witness, the witness's qualifications as an expert, the subject matter upon which the witness is expected to testify, the substance of the facts and opinions to which the witness is expected to testify, and a summary of the grounds for each opinion.
15. Have you made an agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in this case? If so, state the terms of the agreement and the parties to it.
16. Please state if you have ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter, and, if so, state whether you were plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

17. Do you wear glasses, contact lenses, or hearing aids? If so, who prescribed them, when were they prescribed, when were your eyes or ears last examined, and what is the name and address of the examiner?
18. Were you suffering from physical infirmity, disability, or sickness at the time of the incident described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?
19. Did you consume any alcoholic beverages or take any drugs or medications within 12 hours before the time of the incident described in the complaint? If so, state the type and amount of alcoholic beverages, drugs, or medication which were consumed, and when and where you consumed them.
20. Did any mechanical defect in the motor vehicle which you were driving at the time of the incident described in the complaint contribute to the incident? If so, describe the nature of the defect and how it contributed to the incident.
21. List the name and address of all persons, corporations, or entities who were registered title owners or who had ownership interest in, or right to control, the motor vehicle that the defendant driver was driving at the time of the incident described in the complaint; and describe both the nature of the ownership interest or right to control the vehicle, and the vehicle itself, including the make, model, year, and vehicle identification number.
22. At the time of the incident described in the complaint, were you engaged in any mission or activity for any other person or entity, including any employer? If so, state the name and address of that person or entity and the nature of the mission or activity.
23. Was the motor vehicle that you were driving at the time of the incident described in the complaint damaged in the incident, and, if so, what was the cost to repair the damage? Additionally, where was your vehicle repaired?
24. Please identify the wireless telephone service carrier(s) that provided Cellular Telephone service to all of the Cellular Telephones that were operational and within the vehicle you were driving on the date of incident under which this complaint arises and please also list each and every phone number for each phone disclosed in this interrogatory.
25. State whether you were using in any way a cellular telephone immediately prior to this collision (i.e. were you using your cell phone when this incident occurred?). If so, what were you using it for?
26. Please state the name and address, if known, of every single person that was in your

vehicle at the time of the collision described in the complaint.

27. Describe all motor vehicle collisions you have been involved in over the past ten (10) years. Also identify the area and/or intersection where each occurred, the County and state in which each occurred, and the date.

AFFIANT

STATE OF FLORIDA)
COUNTY OF _____)

BEFORE ME, the undersigned authority, personally appeared _____, who being duly sworn, deposes and says that the answers to Interrogatories attached hereto are true to the best of his/her knowledge, information and belief.

SWORN TO AND SUBSCRIBED before me on this _____ day of _____, 2021.

NOTARY PUBLIC, STATE OF FLORIDA
AT LARGE

My Commission Expires:

Personally known: _____

or Produced Identification: _____

Type of Identification Produced: _____

RETURN OF SERVICE

State of Florida

County of Broward

Circuit Court

Case Number: CACE-21-019815

Plaintiff:

LUIS CARLOS CORTINA

vs.

Defendant:

LUIS MANUEL MISPIRETA., et al.,

For:

JORDAN KIRBY

RUBENSTEIN LAW, P.A. (FT. LAUDERDALE)

261 N. UNIVESITY DRIVE

SUITE # 700


PLANTATTION, FL 33324

Received by Executive Express Courier Services, LLC. on the 2nd day of November, 2021 at 4:24 pm to be served on **AMAZON.COM, INC., C/O CORPORATION SERVICE COMPANY, 1201 HAYS STREET, TALLAHASSEE, FL 32301.**

I, Christopher Compton, do hereby affirm that on the **3rd day of November, 2021 at 11:10 am, I:**

SERVED the within named corporation by delivering a true copy of the Summons, Complaint For Damages And Demand For Jury Trial, Interrogatories, Request For Production AND Designation of Email Addresses with the date and hour of service endorsed thereon by me to: SHEENA BLACK as employee of the Registered Agent (Company) for AMAZON.COM, INC., at 1201 HAYS STREET, TALLAHASSEE, FL 32301 and informed said person of the contents therein, pursuant to F.S. 48.081

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the Second Judicial Circuit in which the process was served. Under penalty of perjury I declare I have read the foregoing documents and that the facts stated in it are true. Notary not required pursuant to FL Statute 92.525 Sec (2).



Christopher Compton
Certified Process Server # 101

Executive Express Courier Services, LLC.
4460 N.W. 73 Ave
Miami, FL 33166
(305) 371-0292

Our Job Serial Number: JRT-2021052053
Ref: 387229 CORTINA VS MISPIRETA



Case Number: CACE-21-019815 Division: 02
Filing # 137654470 E-Filed 11/01/2021 03:11:23 PM

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.:

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the COMPLAINT, INTERROGATORIES, REQUEST FOR PRODUCTION, AND EMAIL DESIGNATION in this action on Defendant:

AMAZON.COM, INC.
c/o CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE, FL 32301

Each Defendant is required to serve written defenses to the Complaint on Plaintiff's Attorney, to wit:

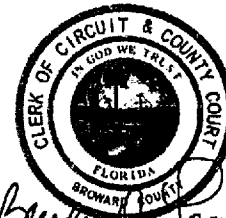
Jordan Kirby, Esquire
RUBENSTEIN LAW, P.A
261 N. University Drive, Suite 700
Plantation, FL 33324
Tel: (305) 661-6000 / Fax: (305) 670-7555

within 20 days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on Plaintiffs' attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED ON: on this on this ____ day of NOV 02 2021

Clerk of Said Court

BY: _____
As Deputy Clerk



BRENDA D. FORMAN

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

CASE NO.: CACE-21-019815

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

Defendants.

DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES
TO PLAINTIFF'S COMPLAINT

Defendant, AMAZON.COM, INC., hereby responds to Plaintiff's Complaint, and states:

1. The allegations of paragraph 1 of Plaintiff's Complaint are admitted for jurisdictional purposes only. Otherwise, the allegations of paragraph 1 of Plaintiff's Complaint are denied.

2. The Defendant is without knowledge regarding the allegations of paragraph 2 of Plaintiff's Complaint, therefore the allegations are denied.

3. The Defendant is without knowledge regarding the allegations of paragraph 3 of Plaintiff's Complaint, therefore the allegations are denied.

4. The allegations of paragraph 4 of Plaintiff's Complaint are denied.

5. The Defendant is without knowledge regarding the allegations of paragraph 5 of Plaintiff's Complaint, therefore the allegations are denied.

6. The Defendant is without knowledge regarding the allegations of paragraph 6 of Plaintiff's Complaint, therefore the allegations are denied.

7. The Defendant is without knowledge regarding the allegations of paragraph 7 of Plaintiff's Complaint, therefore the allegations are denied.

**COUNT I — PLAINTIFF'S NEGLIGENCE CLAIM AGAINST
DEFENDANT, LUIS MANUEL MISPIRETA**

8. The allegations of paragraph 8 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 8 are denied.

9. The allegations of paragraph 9 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 9 are denied.

10. The allegations of paragraph 10 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 10 are denied.

**COUNT II — PLAINTIFF'S VICARIOUS LIABILITY CLAIM AGAINST
DEFENDANT, AMAZON.COM, INC.**

11. The allegations of paragraph 11 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 11 are denied.

12. The allegations of paragraph 12 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 12 are denied.

13. The allegations of paragraph 13 of Plaintiff's Complaint are denied.
14. The allegations of paragraph 14 of Plaintiff's Complaint are denied.
15. The allegations of paragraph 15 of Plaintiff's Complaint are denied.
16. The allegations of paragraph 16 of Plaintiff's Complaint are denied.

AFFIRMATIVE DEFENSES

1. Defendant affirmatively alleges that Plaintiff was negligent in failing to utilize available and operational seatbelts or safety devices, all of which directly and proximately resulted in the injuries and damages incurred, if any. Any recovery by the Plaintiff in this action must be reduced in accordance with her negligence as a matter of law.

2. At all times material hereto, Plaintiff was guilty of negligence in the operation and maintenance of the motor vehicle she was driving and such was the proximate cause of the accident. Any recovery by Plaintiff in this action must be reduced in accordance with Plaintiff's negligence.

3. Defendant affirmatively alleges that the injuries and damages sustained by Plaintiff, if any, fail to satisfy the mandates and requirements of §627.737(2), Florida Statutes, which are a condition precedent to recovery of certain damages in this action.

4. Defendant affirmatively alleges that it is entitled to a setoff of all collateral source benefits paid or payable to Plaintiff under the provision of §§627.736(3) and 768.76, Florida Statutes, or any other applicable statutes.

5. Defendant affirmatively alleges that any losses and damages sustained by Plaintiff was not the direct and proximate result of any actions of this Defendant but,

instead, were the natural consequences of the acts of certain third parties and/or intervening cause. Defendant reserves the right to amend this affirmative defense to comply with *Messmer v. Teacher Insurance Co.*, 588 So.2d 610 (Fla. 5th DCA 1991) and *Fabré v. Martin*, 623 So.2d 1182 (Fla. 1993), upon continuing discovery. Defendant reserves the right, pursuant to *Nash v. Wells Fargo Guard Services, Inc.*, 678 So.2d 1262 (Fla. 1996), to specifically identify any other person or entity that discovery discloses is or may be liable for part or all of Plaintiff's claims.

6. If at the time of the accident sued upon, Plaintiff had health insurance or benefits which have covered all or a part of her bills, and which would have resulted in reductions in the amounts which would have to be repaid to their health care providers, per Florida case law, and Plaintiff failed to mitigate damages by choosing medical providers who would accept her health insurance or benefits, then Plaintiff should not be entitled to recover any damages which would have been avoided had they mitigated same by choosing health care providers who would have taken his insurance or benefits, which would have resulted in reductions of amount due.

7. Defendant affirmatively alleges Plaintiff is subject to a deductible in her personal injuries protection benefits and has no right to claim or recover those amounts from the Defendant pursuant to §627.739(1), Florida Statutes.

8. Defendant affirmatively alleges Plaintiff failed to mitigate the damages she alleges to have suffered in Plaintiff's Complaint by failing to comply with medical advice, failing to seek medical treatment timely or by failing to provide medical providers true and accurate information about her condition.

9. Defendant specifically reserves its right to amend and plead any and all Affirmative Defenses that may become known to him during the course of discovery

DEMAND FOR JURY TRIAL

Defendants demand a trial by a jury on all issues.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 1st 2021, I electronically filed the foregoing pursuant to the Supreme Court of Florida Order No. AOSC13-49 with the Clerk of Court by using the Florida Courts E-Filing Portal who will send notice of this electronic filing to: **JORDAN M. KIRBY, ESQUIRE**, RUBENSTEIN LAW, P.A., (jkirby@rubensteinlaw.com; atello@rubensteinlaw.com; eservice@rubensteinlaw.com) (Attorney for Plaintiff).

**WILSON, ELSER, MOSKOWITZ
EDELMAN & DICKER LLP**
*Counsel for Defendant, AMAZON.COM
SERVICES, INC.*

100 SE Second Street, Suite 2100
Miami, Florida 33131
Telephone: 305-374-4400
Facsimile: 305-579-0261

By: /s/ Steven C. Jones
ANTHONY P. STRASIUS
Florida Bar No. 988715
Anthony.strasius@wilsonelser.com
STEVEN C. JONES
Florida Bar No. 107516
Steven.jones@wilsonelser.com

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

CASE NO.: CACE-21-019815

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

Defendants.

DEFENDANT, AMAZON.COM, INC.'S
FIRST REQUEST TO PRODUCE TO PLAINTIFF

YOU ARE HEREBY requested to produce and permit the undersigned attorneys for the Defendant, AMAZON.COM, INC., to examine, inspect and/or copy the following designated items within thirty days at the offices of the undersigned:

1. Income tax returns filed by the Plaintiff individually or any business entity in which Plaintiff had any interest, or copies thereof, for the years 2015-2019 and a record of earnings to date.
2. All medical reports, including hospital records, pertaining to the injuries alleged in the complaint and any and all medical records in the possession of plaintiff prior to or subsequent to the date of the alleged accident.
3. All bills for medical and related expenses and any other documentation of claimed special damages, including lost wages.
4. Statements made by any representative of Defendant relating to the occurrence alleged in the Complaint.

5. Statements made by any witness to the alleged occurrence.
6. Photographs taken of the scene of the occurrence, or objects involved, and the effects of any injuries as alleged in the complaint.
7. Any and all insurance policies, including the declaration sheets, providing benefits or coverage to Plaintiff for any claimed injury or damage from the subject accident or occurrence.
8. A copy of all notifications of intent to claim damages sent to any provider of any collateral source pursuant to Section 768.76, Florida Statutes.
9. A copy of all statements from any provider of any collateral source asserting any lien, right of subrogation or reimbursement.
10. Any and all records from Medicare and/or Medicaid relating to payment of medical expenses related to treatment.
11. Copies of any and all letters of protection to any medical care provider or any and all letters of protection from any medical care provider concerning treatment of your alleged injuries.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 1, 2021, I electronically filed the foregoing pursuant to the Supreme Court of Florida Order No. AOSC13-49 with the Clerk of Court by using the Florida Courts E-Filing Portal who will send notice of this electronic filing to:

JORDAN M. KIRBY, ESQUIRE, RUBENSTEIN LAW, P.A.,
(jkirby@rubensteinlaw.com; atello@rubensteinlaw.com; eservice@rubensteinlaw.com)
(Attorney for Plaintiff).

**WILSON, ELSER, MOSKOWITZ
EDELMAN & DICKER LLP**
*Counsel for Defendant, AMAZON.COM
SERVICES, INC.*

100 SE Second Street, Suite 2100
Miami, Florida 33131

Telephone: 305-374-4400

Facsimile: 305-579-0261

By: /s/ Steven C. Jones

ANTHONY P. STRASIUS

Florida Bar No. 988715

Anthony.strasius@wilsonelser.com

STEVEN C. JONES

Florida Bar No. 107516

Steven.jones@wilsonelser.com

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

CASE NO.: CACE-21-019815

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

Defendants.

**DEFENDANT, AMAZON.COM, INC.'S, NOTICE OF SERVICE OF FIRST SET
OF INTERROGATORIES TO PLAINTIFF, LUIS CARLOS CORTINA**

NOTICE IS HEREBY GIVEN that Defendant, AMAZON.COM, INC., served its First Set of Interrogatories, numbered 1 to 12, to Plaintiff LUIS CARLOS CORTINA to be answered in writing and under oath within 30 days.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 1st, 2021, I electronically filed the foregoing pursuant to the Supreme Court of Florida Order No. AOSC13-49 with the Clerk of Court by using the Florida Courts E-Filing Portal who will send notice of this electronic filing to: **JORDAN M. KIRBY, ESQUIRE**, RUBENSTEIN LAW, P.A., (jkirby@rubensteinlaw.com; atello@rubensteinlaw.com; eservice@rubensteinlaw.com) (Attorney for Plaintiff).

**WILSON, ELSER, MOSKOWITZ
EDELMAN & DICKER LLP**
*Counsel for Defendant, AMAZON.COM
SERVICES, INC.*

100 SE Second Street, Suite 2100
Miami, Florida 33131

Telephone: 305-374-4400

Facsimile: 305-579-0261

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IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

CASE NO.: CACE-21-019815

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

Defendants.

**DEFENDANT, AMAZON.COM, INC.'S, NOTICE OF SERVICE OF FIRST SET
OF INTERROGATORIES TO PLAINTIFF, LUIS CARLOS CORTINA**

NOTICE IS HEREBY GIVEN that Defendant, AMAZON.COM, INC., served its First Set of Interrogatories, numbered 1 to 12, to Plaintiff LUIS CARLOS CORTINA to be answered in writing and under oath within thirty days.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 1st, 2021, I electronically filed the foregoing pursuant to the Supreme Court of Florida Order No. AOSC13-49 with the Clerk of Court by using the Florida Courts E-Filing Portal who will send notice of this electronic filing to: **JORDAN M. KIRBY, ESQUIRE**, RUBENSTEIN LAW, P.A., (jkirby@rubensteinlaw.com; atello@rubensteinlaw.com; eservice@rubensteinlaw.com) (Attorney for Plaintiff).

**WILSON, ELSER, MOSKOWITZ
EDELMAN & DICKER LLP**
*Counsel for Defendant, AMAZON.COM
SERVICES, INC.*

100 SE Second Street, Suite 2100
Miami, Florida 33131

Telephone: 305-374-4400

Facsimile: 305-579-0261

By: /s/ Steven C. Jones

ANTHONY P. STRASIUS

Florida Bar No. 988715

Anthony.strasius@wilsonelser.com

STEVEN C. JONES

Florida Bar No. 107516

Steven.jones@wilsonelser.com

INTERROGATORIES TO PLAINTIFF, LUIS CARLOS CORTINA

1. Please describe in detail the society, services, consortium and companionship which your spouse rendered to you in the year prior to the date of the accident complained of.

ANSWER:

2. If you contend your spouse has failed to provide society, services, consortium, and companionship mentioned in your answer to the preceding interrogatory, please state in detail why your spouse has failed to provide the same since the date of the accident described in the Complaint.

ANSWER:

3. State the date and place of your marriage.

ANSWER:

4. List all of Plaintiff's former name(s) and when you were known by those name(s). State all addresses where you have lived for the past ten years, the dates you lived at each address, your Social Security number, your date of birth.

ANSWER:

5. If you have ever been previously married, please state the name and present address of your former spouse; the date and place of each previous marriage; how said marriages were terminated (i.e., death, divorce, etc.); and the date on which each was terminated.

ANSWER:

6. If any prior marriage has ended in divorce, please state the case style, case number, jurisdiction and date of dissolution.

ANSWER:

7. State whether or not you have individually or as a couple retained the services of a marriage counselor or if you have sought counseling through your pastor or any other type of marriage counseling organization. If so, state the name, address, and telephone number of such pastor or marriage counseling organization.

ANSWER:

8. Have you ever been separated? If so, please state when, how long, and the reason for each such separation.

ANSWER:

9. Does your spouse work? If so, please state your spouse's income, what portion of that income is contributed to the family income, and name and address of your spouse's employment.

ANSWER:

10. Has your spouse been unemployed at any time within the last five years for reasons unrelated to this accident or incident? If so, please state the dates and reasons for each period of unemployment.

ANSWER:

11. Are you suffering from any disabilities, illnesses or infirmities? If so, please state the disabilities, illnesses or infirmities, and names, addresses, and telephone numbers of any treating physicians or health care providers.

ANSWER:

12. As a result of the injuries alleged in your complaint, has it been necessary for you to hire outside help to complete jobs or render services your injured spouse is unable to do? If so, please describe the jobs and services, and give the names, addresses and telephone numbers of the persons rendering such services.

ANSWER:

VERIFICATION

The answers to the foregoing interrogatories are true and correct to the best of my knowledge.

Luis Carlos Cortina

[illegible]

SWORN TO (or AFFIRMED) AND SUBSCRIBED
before me this ____ day of _____, 2021.

NOTARY PUBLIC, STATE OF FLORIDA
Print Name/Stamp Commissioned Name:
PERSONALLY KNOWN: _____
PRODUCED IDENTIFICATION: _____
TYPE OF IDENTIFICATION: _____

AFFIDAVIT OF SERVICE

State of Florida

County of Broward

Circuit Court

Case Number: CACE-21-019815

Plaintiff:

LUIS CARLOS CORTINA

vs.

Defendant:

LUIS MANUEL MISPIRETA., et al.,

For:

JORDAN KIRBY
RUBENSTEIN LAW, P.A. (FT. LAUDERDALE)
261 N. UNIVERSITY DRIVE
SUITE # 700
PLANTATTION, FL 33324

Received by Executive Express Courier Services, LLC on the 6th day of January, 2022 at 2:15 pm to be served on **LUIS MANUEL MISPIRETA, 10326 ATKINS RIDGE DRIVE, CHARLOTTE, NC 28213.**

I, Jorge Acosta, being duly sworn, depose and say that on the **11th day of January, 2022 at 2:56 pm, I:**

SUBSTITUTE served by delivering a true copy of the **Summons, Complaint For Damages And Demand For Jury Trial, Interrogatories, Request For Production AND Designation of Email Addresses** with the date and hour of service endorsed thereon by me, to: **WILLIAM ARMAS as CO-RESIDENT** at the alternate address of: **6150 S.W. 130 AVENUE, APT # 1509, MIAMI, FL 33183**, the within named person's usual place of **Abode**, who resides therein, who is fifteen (15) years of age or older and informed said person of the contents therein, in compliance with state statutes.

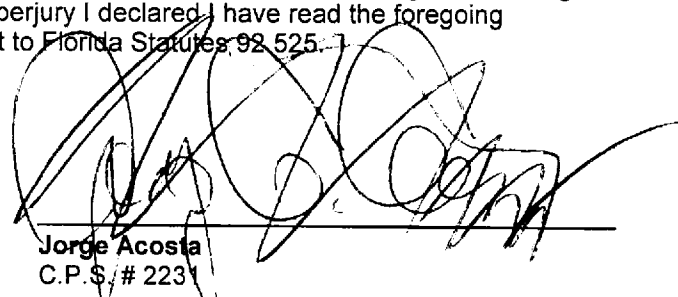
Additional Information pertaining to this Service:

1/10/2022 4:33 pm Attempted service at 10326 ATKINS RIDGE DRIVE, CHARLOTE, NC 28213 - Sever spoke with current resident, Ms. Petit, whom stated that she moved in three years and does not know subject.

I certify that I am over the age of 18, have no interest in the above action, and I am a Process Server, in good standing, in the Judicial Circuit in which the process was served. Under penalty of perjury I declared I have read the foregoing documents and that the facts stated in it are true and correct. Pursuant to Florida Statutes 92.525.

Subscribed and Sworn to before me on the 11th day of January, 2022 by the affiant who is personally known to me.


NOTARY PUBLIC


Jorge Acosta
C.P.S. # 2231

Executive Express Courier Services, LLC
4460 N.W. 73 Avenue
Miami, FL 33166
(305) 371-0292

Our Job Serial Number: JRT-2022052699
Ref: 387229 CORTINA VS MISPIRETA

Case Number: CACE-21-019815 Division: 02
Filing # 137654470 E-Filed 11/01/2021 03:11:23 PM

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.:

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the COMPLAINT, INTERROGATORIES, REQUEST FOR PRODUCTION, AND EMAIL DESIGNATION in this action on Defendant:

LUIS MANUEL MISPIRETA
20520 Highland Lakes Boulevard
Miami, FL 33179

Each Defendant is required to serve written defenses to the Complaint on Plaintiff's Attorney, to wit:

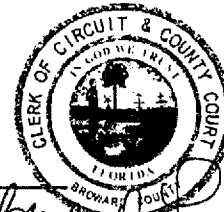
Jordan Kirby, Esquire
RUBENSTEIN LAW, P.A
261 N. University Drive, Suite 700
Plantation, FL 33324
Tel: (305) 661-6000 / Fax: (305) 670-7555

within 20 days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on Plaintiffs' attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED ON: on this on this ____ day of NOV 02 2021

Clerk of Said Court

BY: _____
As Deputy Clerk
(Court Seal)



BRENDA D. FORMAN

52699

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.: CACE-21-019815 DIV: 02

PLAINTIFF'S RESPONSE TO DEFENDANT, AMAZON.COM, INC.'S REQUEST FOR PRODUCTION

COMES NOW, the Plaintiff, **Luis Carlos Cortina**, by and through the undersigned counsel, hereby files his response to Defendant, **Amazon.com Inc.'s** Request for Production served December 1, 2021, as follows:

1. Income tax returns filed by the Plaintiff individually or any business entity in which Plaintiff had any interest, or copies thereof, for the years 2015-2019 and a record of earnings to date.

Response: None in Plaintiff's possession. Plaintiff is willing to execute an authorization so that Defendant can obtain this information directly from the IRS.

2. All medical reports, including hospital records, pertaining to the injuries alleged in the complaint and any and all medical records in the possession of plaintiff prior to or subsequent to the date of the alleged accident.

Response: Those currently in Plaintiff's possession, custody or control are attached hereto.

3. All bills for medical and related expenses and any other documentation of claimed special damages, including lost wages.

Response: Those currently in Plaintiff's possession, custody or control are attached hereto.

4. Statements made by any representative of Defendant relating to the occurrence alleged in the Complaint.

Response: None in Plaintiff's possession.

5. Statements made by any witness to the alleged occurrence.

Response: None in Plaintiff's possession.

6. Photographs taken of the scene of the occurrence, or objects involved, and the effects of any injuries as alleged in the complaint.

Response: Those currently in Plaintiff's possession, custody or control are attached hereto.

7. Any and all insurance policies, including the declaration sheets, providing benefits or coverage to Plaintiff for any claimed injury or damage from the subject accident or occurrence.

Response: Those currently in Plaintiff's possession, custody or control are attached hereto.

8. A copy of all notifications of intent to claim damages sent to any provider of any collateral source pursuant to Section 768.76, Florida Statutes.

Response: Those currently in Plaintiff's possession, custody or control are attached hereto.

9. A copy of all statements from any provider of any collateral source asserting any lien, right of subrogation or reimbursement.

Response: Those currently in Plaintiff's possession, custody or control are attached hereto.

10. Any and all records from Medicare and/or Medicaid relating to payment of medical expenses related to treatment.

Response: None.

11. Copies of any and all letters of protection to any medical care provider or any and all letters of protection from any medical care provider concerning treatment of your alleged injuries.

Response: Those currently in Plaintiff's possession, custody or control are attached hereto.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically submitted on this 15th day of February 2022 to: Steven C. Jones, Esq., Anthony P. Strasius; WILSON, ELSE, MOSKOWITZ EDELMAN & DICKER LLP Counsel for Defendant, AMAZON.COM SERVICES, INC., 100 SE Second Street, Suite 2100 Miami, Florida 33131; Anthony.strasius@wilsonelser.com; Steven.jones@wilsonelser.com.

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff
261 N. University Drive, Suite 700
Plantation, FL 33324
Phone: (305) 661-6000
Fax: (305) 670-7555
Email: jkirby@rubensteinlaw.com
atello@rubensteinlaw.com
eservice@rubensteinlaw.com

By: /s/Jordan M. Kirby
Jordan M. Kirby, Esq.
Florida Bar No.: 67217

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.: CACE-21-019815 DIV: 02

**PLAINTIFF'S NOTICE OF SERVING VERIFIED ANSWERS TO DEFENDANT, AMAZON.COM, INC.'S
FIRST SET OF INTERROGATORIES DATED DECEMBER 1, 2021**

COMES NOW, the Plaintiff, **Luis Carlos Cortina**, by and through the undersigned attorney,
and hereby files his answers to Defendant, **Amazon.com, Inc.'s** First Set of Interrogatories dated
December 1, 2021.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically
submitted on this 15th day of February 2022 to: Steven C. Jones, Esq., Anthony P. Strasius;
WILSON, ELSER, MOSKOWITZ EDELMAN & DICKER LLP Counsel for Defendant, AMAZON.COM
SERVICES, INC., 100 SE Second Street, Suite 2100 Miami, Florida 33131;
Anthony.strasius@wilsonelser.com; Steven.jones@wilsonelser.com.

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff
9130 S. Dadeland Blvd, PH
Miami, FL 33156
Tel: (305) 661-6000
Fax: (305) 670-7555
Email: Jkirby@rubensteinlaw.com
atello@rubensteinlaw.com
eservice@rubensteinlaw.com

By: /s/ Jordan Kirby
Jordan Kirby

CACE-21-019815 DIV: 02

Florida Bar No.: 67217

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.: CACE-21-019815 DIV: 02

**PLAINTIFF'S NOTICE OF SERVING VERIFIED ANSWERS TO DEFENDANT, AMAZON.COM, INC.'S
FIRST SET OF INTERROGATORIES DATED DECEMBER 1, 2021**

COMES NOW, the Plaintiff, **Luis Carlos Cortina**, by and through the undersigned attorney,
and hereby files his answers to Defendant, **Amazon.com, Inc.'s** First Set of Interrogatories dated
December 1, 2021.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically
submitted on this 15th day of February 2022 to: Steven C. Jones, Esq., Anthony P. Strasius;
WILSON, ELSER, MOSKOWITZ EDELMAN & DICKER LLP Counsel for Defendant, AMAZON.COM
SERVICES, INC., 100 SE Second Street, Suite 2100 Miami, Florida 33131;
Anthony.strasius@wilsonelser.com; Steven.jones@wilsonelser.com.

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff

9130 S. Dadeland Blvd, PH

Miami, FL 33156

Tel: (305) 661-6000

Fax: (305) 670-7555

Email: Jkirby@rubensteinlaw.com

atello@rubensteinlaw.com

eservice@rubensteinlaw.com

By: /s/ Jordan Kirby

Jordan Kirby

CACE-21-019815 DIV: 02

Florida Bar No.: 67217

**PLAINTIFF'S VERIFIED ANSWERS TO DEFENDANT'S
AMAZON.COM, INC.'S FIRST SET OF INTERROGATORIES DATED DECEMBER 1, 2021**

1. Please describe in detail the society, services, consortium and companionship which your spouse rendered to you in the year prior to the date of the accident complained of.

ANSWER: Not applicable. Plaintiff is not married.

2. If you contend your spouse has failed to provide society, services, consortium, and companionship mentioned in your answer to the preceding interrogatory, please state in detail why your spouse has failed to provide the same since the date of the accident described in the Complaint.

ANSWER: Not applicable.

3. State the date and place of your marriage.

ANSWER: Not applicable.

4. List all of Plaintiff's former name(s) and when you were known by those name(s). State all addresses where you have lived for the past ten years, the dates you lived at each address, your Social Security number, your date of birth.

ANSWER:

Plaintiff has not been known by any other names.

Addresses:

[REDACTED]

Social Security Number: [REDACTED]

Date of birth: [REDACTED]

5. If you have ever been previously married, please state the name and present address of your former spouse; the date and place of each previous marriage; how said marriages were terminated (i.e., death, divorce, etc.); and the date on which each was terminated.

ANSWER: Plaintiff was previously married to Melby Cortina. Plaintiff is unaware of her present address. They were married in the mid-1990's in Dade County. The marriage was ended in divorce in 2002/2003 in Dade County.

6. If any prior marriage has ended in divorce, please state the case style, case number, jurisdiction and date of dissolution.

ANSWER: Melby Yohana Cortina v. Luis Carlos Cortina. Case number 2002-018333-FC-04. Dade County. Final judgment in May 2003.

7. State whether or not you have individually or as a couple retained the services of a marriage counselor or if you have sought counseling through your pastor or any other type of marriage counseling organization. If so, state the name, address, and telephone number of such pastor or marriage counseling organization.

ANSWER: None.

8. Have you ever been separated? If so, please state when, how long, and the reason for each such separation.

ANSWER: Not applicable.

9. Does your spouse work? If so, please state your spouse's income, what portion of that income is contributed to the family income, and name and address of your spouse's employment.

ANSWER: Not applicable.

10. Has your spouse been unemployed at any time within the last five years for reasons unrelated to this accident or incident? If so, please state the dates and reasons for each period of unemployment.

ANSWER: Not applicable.

11. Are you suffering from any disabilities, illnesses or infirmities? If so, please state the disabilities, illnesses or infirmities, and names, addresses, and telephone numbers of any treating physicians or health care providers.

ANSWER: None other than the injuries that Plaintiff has sustained as a result of the subject incident.

12. As a result of the injuries alleged in your complaint, has it been necessary for you to hire outside help to complete jobs or render services your injured spouse is unable to do? If so, please describe the jobs and services, and give the names, addresses and telephone numbers of the persons rendering such services.

CACE-21-019815 DIV: 02

ANSWER: Not applicable.

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

CASE NO.: CACE-21-019815

v.

LUIS MANUEL MISPIRETA
and AMAZON.COM, INC.,

Defendants.

NOTICE OF APPEARANCE AND DESIGNATION OF E-MAIL ADDRESS

Please take notice that the law office of **WILSON, ELSEER, MOSKOWITZ, EDELMAN & DICKER LLP** enters its appearance as counsel for AMAZON.COM, INC. Pursuant to Florida Rules of Judicial Administration 2.516, this notice hereby designates the following E-Mail addresses and further instructs this Court and all other parties herein to forward copies of all pleadings, notices, etc., regarding the above-styled cause directly to the undersigned.

E-Mail: anthony.strasius@wilsonelser.com

E-Mail: mercedes.aquino@wilsonelser.com

E-Mail: gerard.dipopolo@wilsonelser.com

E-Mail: julie.lennon@wilsonelser.com

E-Mail: darwin.castillo@wilsonelser.com

E-Mail: eservice.miami@wilsonelser.com

[THE REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 14th day of March, 2022, a true and correct copy of the above and foregoing document was filed with the Clerk of the above styled Court using eFiling Portal. We also certify that the foregoing document was served this day on all counsel of record or pro se parties identified on the attached Service List via electronic mail or in some other authorized manner for those counsel or parties who are not authorized to receive filings by electronic mail.

Respectfully submitted,

***WILSON, ELSE, MOSKOWITZ,
EDELMA & DICKER LLP***

Counsel for Defendant, Amazon.com, Inc.

100 SE Second Street, Suite 2100

Miami, Florida 33131

Telephone: 305-374-4400

Facsimile: 305-579-0261

By: /s/ Gerard Di Popolo

ANTHONY P. STRASIUS

Florida Bar No.: 988715

anthony.strasius@wilsonelser.com

Gerard Di Popolo

Florida Bar No.: 117677

gerard.dipopolo@wilsonelser.com

SERVICE LIST

Jordan Kirby, Esq.

Florida Bar No.: 67217

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Plantation, Florida 33324

Tel: 305-661-6000

Fax: 305-670-7555

jkirby@rubensteinlaw.com

atello@rubensteinlaw.com

eservice@rubensteinlaw.com

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

CASE NO.: CACE-21-019815

v.

LUIS MANUEL MISPIRETA
and AMAZON.COM, INC.,

Defendants.

**DEFENDANT, AMAZON.COM, INC.'S, NOTICE OF SERVICE OF SUPPLEMENTAL
INTERROGATORIES TO PLAINTIFF, LUIS CARLOS CORTINA**

NOTICE IS HEREBY GIVEN that Defendant, AMAZON.COM, INC., served its
Supplemental Interrogatories, to Plaintiff LUIS CARLOS CORTINA to be answered in writing
and under oath within 30 days.

[THE REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 22nd day of March, 2022, a true and correct copy of the above and foregoing document was filed with the Clerk of the above styled Court using eFiling Portal. We also certify that the foregoing document was served this day on all counsel of record or pro se parties identified on the attached Service List via electronic mail or in some other authorized manner for those counsel or parties who are not authorized to receive filings by electronic mail.

Respectfully submitted,

***WILSON, ELSE, MOSKOWITZ,
EDELMA & DICKER LLP***

Counsel for Defendant, Amazon.com, Inc.

100 SE Second Street, Suite 2100

Miami, Florida 33131

Telephone: 305-374-4400

Facsimile: 305-579-0261

By: /s/ Gerard Di Popolo

ANTHONY P. STRASIUS

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Jordan Kirby, Esq.

Florida Bar No.: 67217

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jkirby@rubensteinlaw.com

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eservice@rubensteinlaw.com

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

CASE NO.: CACE-21-019815

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

Defendants.

**DEFENDANT, AMAZON.COM, INC.'S, SUPPLEMENTAL
INTERROGATORIES TO PLAINTIFF, LUIS CARLOS CORTINA**

NOTICE IS HEREBY GIVEN that Defendant, AMAZON.COM, INC., served its Supplemental Interrogatories, to Plaintiff LUIS CARLOS CORTINA to be answered in writing and under oath within 30 days.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 2022, I electronically filed the foregoing pursuant to the Supreme Court of Florida Order No. AOSC13-49 with the Clerk of Court by using the Florida Courts E-Filing Portal who will send notice of this electronic filing to: **JORDAN M. KIRBY, ESQUIRE, RUBENSTEIN LAW, P.A.,** (jkirby@rubensteinlaw.com; atello@rubensteinlaw.com; eservice@rubensteinlaw.com) (Attorney for Plaintiff).

**WILSON, ELSER, MOSKOWITZ
EDELMAN & DICKER LLP**

Counsel for Defendant, AMAZON.COM, INC.
100 SE Second Street, Suite 2100
Miami, Florida 33131
Telephone: 305-374-4400
Facsimile: 305-579-0261

By: /s/ Gerard Di Popolo
ANTHONY P. STRASIUS
Florida Bar No.: 988715
anthony.strasius@wilsonelser.com
Gerard Di Popolo
Florida Bar No.: 117677
gerard.dipopolo@wilsonelser.com

DEFINITIONS

1. “You” and/or “Plaintiff” and/or “Your” and/or “Yourself” refers to Vaughn Woodall and/or any agents, representatives, officers, attorneys, and/or anyone else purporting to act for or on behalf of Luis Cortina.
2. “Defendant” refers to Defendant, AMAZON.COM, INC., and/or all of their employees, agents, representatives, attorneys, and/or anyone else acting on their behalf.
3. “Amazon” refers to Defendant AMAZON.COM, INC., and/or all of their employees, agents, representatives, attorneys, and/or anyone else acting on their behalf.
4. “Incident” or “Incident made the basis of this lawsuit” refers to the motor vehicle accident made the subject of Plaintiff’s *Complaint*.
5. “Describe” means a detailed statement of all things relating to or affecting the particular subject to be described including, but not limited to, dates and places and the names and addresses of any persons involved. With reference to documents, communications and agreements, the term “describe” also includes a detailed statement of the substance of the facts and opinions made reference to or stated in each document, communication or agreement.
6. "Document" and "documents" shall be used in their broadest sense and shall mean and include all written, printed, typed, records or graphic matter of every kind and description, both originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries or other records of personal conversations, minutes of

summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, visitor records, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, notices, marginal notations, notebooks, telephone bills or records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, files, printouts, compilations, tabulations, purchase orders, receipts, sell orders, confirmations, checks, cancelled checks, letters of credit, envelopes or folders or similar containers, voucher analyses, studies, surveys transcripts of hearings, transcripts of testimony, expense reports, microfilm, microfiche, articles, speeches, tape or disc recordings, sound recordings, video recordings, film, tapes, photographs, punch cards, programs, data compilations from which information can be obtained (including matter used in data processing), and other reprinted, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made. The terms "document" and "documents" shall include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced. "Document" and "documents" means and includes all matter within the foregoing description that is in the possession, control or custody of Plaintiff, or in the possession, custody or control of the attorney for Plaintiff. Without limiting the term "control," a document is deemed to be within your control if you have ownership, possession or custody of the document, or the right to secure the document or copy thereof from any person or public or private entity having physical control thereof.

7. As used herein, the words "and" and "or" shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these Interrogatories any document that might be deemed outside its scope by another construction.
8. "Person" shall mean any individual, partnership, association, corporation, joint venture, firm, proprietorship, agency, board, authority, commission, or other legal or business entity.
9. "Statement" means and includes any written or graphic statement signed or otherwise adopted or approved by the users in making it, any stenographic, mechanical, electrical or other recording or transcription thereof which is a substantially verbatim recital of an oral statement made by the person making it and contemporaneously recorded.
10. "Plaintiff's Complaint" means Plaintiff's Original Complaint and all subsequent complaints filed thereafter in this case.

AMAZON'S SUPPLEMENTAL INTERROGATORIES TO PLAINTIFF

1. What is the name and address of the person answering these interrogatories and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

2. List the names, business addresses, dates of employment and rates of pay regarding all employers, including self-employment, for whom you have worked in the past ten years.

3. List all former names and when you were known by those names. State all addresses where you have lived for the past ten years, the dates you lived at each address, your Social Security number, your date of birth, and if you are or have ever been married, the name of your spouse or spouses.

4. Do you wear glasses, contact lenses or hearing aids? If so, who prescribed them; when were they prescribed; when were your eyes or ears last examined; and what is the name and address of the examiner?

5. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of one year, or that involved dishonesty or false statement regardless of the punishment? If so, state as to each conviction the specific crime, the date and the place of conviction.

6. Were you suffering from physical infirmity, disability, or sickness at the time of the incident described in the complaint? If so, what was the nature of the infirmity, disability or sickness?

7. Did you consume any alcoholic beverages or take any drugs or medication within twelve hours before the time of the incident described in the complaint? If so, state the type and amount of alcoholic beverages, drugs or medication which were consumed and when and where you consumed them.

8. Describe in detail how the incident described in the complaint happened, including all actions taken by you to prevent the incident.

9. Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question.

10. Were you charged with any violation of law (including any regulations or ordinances) arising out of the incident described in the complaint? If so, what was the nature of the charge; what plea, or answer, if any, did you enter to the charge; what court or agency heard the charge; was any written report prepared by anyone regarding this charge, and if so, what is the name and address of the person or entity that prepared the report; do you have a copy of the report; and was the testimony at any trial, hearing or other proceeding on the charge recorded in any manner, and if so, what was the name and address of the person who recorded the testimony?

11. Describe each injury for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury, and, as to any injuries you contend are permanent, the effects on you that you claim are permanent.

12. List each item of expense or damage, other than loss of income or earning capacity, that you claim to have incurred as a result of the incident described in the complaint, giving for each item the date incurred, the name and business address to whom each was paid or is owed, and the goods or services for which each was incurred.

13. Do you contend that you have lost any income, benefits, or earning capacity in the past or future as a result of the incident described in the complaint? If so, state the nature of the income, benefits, or earning capacity, and the amount and the method that you used in computing the amount.

14. Has anything been paid or is anything payable from any third party for the damages listed in your answers to these interrogatories? If so, state the amounts paid or payable, the name and business address of the person or entity who paid or owes said amounts, and which of those third parties have or claim a right of subrogation.

15. List the names and business addresses of each physician who has treated or examined you, and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.

16. List the names and business addresses of all other physicians, medical facilities or other health care providers by whom or at which you have been examined or treated in the past ten years; and state as to each the dates of examination or treatment and the condition or injury for which you were examined or treated.

17. List the names and addresses of all persons who are believed or known by you, your agents or attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.

18. Have you heard or do you know about any statement or remark made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name and addresses of each person who made the statement or statements, the name and address of each person who heard it, and the date, time, place and substance of each statement.

19. Have you made an agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in this case? If so, state the terms of the agreement and the parties to it.

20. Please state if you have ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter and if so, state whether you were plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

21. State the name and address of every person known to you, your agents, or attorneys, who has knowledge about, or possession, custody or control of any model, plat, map, drawing, motion picture, video tape, or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.

VERIFICATION

STATE OF _____)
 _____)SS
 COUNTY OF _____)

LUIS CORTINA, being duly sworn, deposes and says that he/she verifies the foregoing answers to Plaintiff's Interrogatories, and swears under penalty of perjury that the foregoing answers are true and correct.

Signature

Print name

BEFORE ME, the undersigned authority, personally appeared _____
who is personally known to me or who presented _____ as identification.

SWORN TO AND SUBSCRIBED before me this ____ day of _____ 2022.

NOTARY PUBLIC, STATE OF _____

Print Name/Stamp Commissioned Name:

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

CASE NO.: CACE-21-019815

v.

LUIS MANUEL MISPIRETA
and AMAZON.COM, INC.,

Defendants.

NOTICE OF APPEARANCE AND DESIGNATION OF E-MAIL ADDRESS

Please take notice that the law office of **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP** enters its appearance as counsel for LUIS MANUEL MISPIRETA. Pursuant to Florida Rules of Judicial Administration 2.516, this notice hereby designates the following E-Mail addresses and further instructs this Court and all other parties herein to forward copies of all pleadings, notices, etc., regarding the above-styled cause directly to the undersigned.

E-Mail: anthony.strasius@wilsonelser.com

E-Mail: mercedes.aquino@wilsonelser.com

E-Mail: gerard.dipopolo@wilsonelser.com

E-Mail: julie.lennon@wilsonelser.com

E-Mail: darwin.castillo@wilsonelser.com

E-Mail: eservice.miami@wilsonelser.com

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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 1st day of April, 2022, a true and correct copy of the above and foregoing document was filed with the Clerk of the above styled Court using eFiling Portal. We also certify that the foregoing document was served this day on all counsel of record or pro se parties identified on the attached Service List via electronic mail or in some other authorized manner for those counsel or parties who are not authorized to receive filings by electronic mail.

Respectfully submitted,

***WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP***
*Counsel for Defendants, Amazon.com, Inc.
and Luis Manuel Mispireta*
100 SE Second Street, Suite 2100
Miami, Florida 33131
Telephone: 305-374-4400
Facsimile: 305-579-0261

By: /s/ Gerard Di Popolo
ANTHONY P. STRASIUS
Florida Bar No.: 988715
anthony.strasius@wilsonelser.com
Gerard Di Popolo
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SERVICE LIST

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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

**LUIS MANUEL MISPIRETA and
AMAZON.COM, INC.,**

Defendants.

CIVIL DIVISION

CASE NO.: CACE-21-019815
DIV: 02

**PLAINTIFF'S NOTICE OF SERVING VERIFIED ANSWERS TO
DEFENDANT'S SUPPLEMENTAL INTERROGATORIES DATED MARCH 22, 2022**

The Plaintiff, **Luis Carlos Cortina**, by and through the undersigned attorney, hereby files his answers to Defendant, **Amazon.com, Inc.'s** Interrogatories dated March 22, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically submitted on this 11th day of April, 2022, to: Steven C. Jones, Esq., Anthony P. Strasius; Gerald De Popolo, Esq., WILSON, ELSER, MOSKOWITZ EDELMAN & DICKER LLP; 100 SE Second Street, Suite 2100 Miami, Florida 33131; Anthony.strasius@wilsonelser.com; Gerard.DiPopolo@wilsonelser.com; mercedes.aquino@wilsonelser.com; julie.lennon@wilsonelser.com; darwin.castillo@wilsonelser.com; eservice.miami@wilsonelser.com.

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff

9130 S. Dadeland Blvd, PH

Miami, FL 33156

Tel: (305) 661-6000

Fax: (305) 670-7555

Email: Jkirby@rubensteinlaw.com
atello@rubensteinlaw.com
eservice@rubensteinlaw.com

By: /s/ Jordan Kirby

Jordan Kirby

Florida Bar No.: 67217

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

**LUIS MANUEL MISPIRETA and
AMAZON.COM, INC.,**

Defendants.

CIVIL DIVISION

CASE NO.: CACE-21-019815

DIV: 02

**PLAINTIFF'S NOTICE OF SERVING VERIFIED ANSWERS TO
DEFENDANT'S SUPPLEMENTAL INTERROGATORIES DATED MARCH 22, 2022**

The Plaintiff, **Luis Carlos Cortina**, by and through the undersigned attorney, hereby files his answers to Defendant, **Amazon.com, Inc.**'s Interrogatories dated March 22, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically submitted on this 11th day of April, 2022, to: Steven C. Jones, Esq., Anthony P. Strasius; Gerald De Popolo, Esq., WILSON, ELSER, MOSKOWITZ EDELMAN & DICKER LLP; 100 SE Second Street, Suite 2100 Miami, Florida 33131; Anthony.strasius@wilsonelser.com; Gerard.DiPopolo@wilsonelser.com; mercedes.aquino@wilsonelser.com; julie.lennon@wilsonelser.com; darwin.castillo@wilsonelser.com; eservice.miami@wilsonelser.com.

RUBENSTEIN LAW, P.A.

Attorneys for Plaintiff

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Tel: (305) 661-6000

Fax: (305) 670-7555

Email: Jkirby@rubensteinlaw.com

atello@rubensteinlaw.com

eservice@rubensteinlaw.com

CACE-21-019815 DIV: 02

By: /s/ Jordan Kirby
Jordan Kirby
Florida Bar No.: 67217

**PLAINTIFF'S VERIFIED ANSWERS TO DEFENDANT'S
SUPPLEMENTAL INTERROGATORIES DATED MARCH 22, 2022**

1. What is the name and address of the person answering these interrogatories and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

ANSWER:

Luis Carlos Cortina


2. List the names, business addresses, dates of employment and rates of pay regarding all employers, including self-employment, for whom you have worked in the past ten years.

ANSWER:

**Advanced Roofing, Inc.
1950 NW 22nd St.
Fort Lauderdale, FL 33311
Approximately December 2016 through present
Currently \$20.00 per hour**

**JJD Contracting Inc.
3400 SW 11th Street
Deerfield Beach, FL 33442
Approximately 2014/2015
Approximately \$20.00 per hour**

**Peach State Roofing Inc.
1401 SW 10th Ave.
Pompano Beach, FL 33069
Approximately 2013
Approximately \$13.00 per hour**

3. List all former names and when you were known by those names. State all addresses where you have lived for the past ten years, the dates you lived at each address, your Social Security number, your date of birth, and if you are or have ever been married, the name of your spouse or spouses.

ANSWER:

Plaintiff has no former names.

**4220 SW 71st Way
Davie, FL 33314
Approximately 2014 through present**

Social Security No.: [REDACTED]

Date of birth: [REDACTED]

Plaintiff is not married.

Plaintiff was previously married to Melby Cortina.

4. Do you wear glasses, contact lenses or hearing aids? If so, who prescribed them; when were they prescribed; when were your eyes or ears last examined; and what is the name and address of the examiner?

ANSWER: Plaintiff wears glasses. Plaintiff does not recall who prescribed his glasses. The last time he went for an eye exam was approximately two years ago.

5. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of one year, or that involved dishonesty or false statement regardless of the punishment? If so, state as to each conviction the specific crime, the date and the place of conviction.

ANSWER: Yes. To the best of Plaintiff's recollection, he has been convicted of the following:

**Grand theft in the 3rd degree in Broward County in 2016;
Driving while license suspended in Miami-Dade County in 2010;
Possession of firearm in Miami-Dade County in 2009/2010;
Driving while license suspended in Miami-Dade County in 2007;
Possession of marijuana and cocaine in Miami-Dade County in 2007;
Petit larceny in Miami-Dade County in 2006/2007;
Providing false name/ID in Miami-Dade County in 2006/2007;
Burglary in Miami-Dade County in 2003;
Petit theft in Orange County in 2002;
Petit larceny in Miami-Dade County in 2000/2001;
Felony battery in Miami-Dade County in 1998/1999;
Possession of marijuana in Miami-Dade County in 1997;
Grand theft and resisting officer in Miami-Dade County in 1993/1994.**

6. Were you suffering from physical infirmity, disability, or sickness at the time of the incident described in the complaint? If so, what was the nature of the infirmity, disability or sickness?

ANSWER: None that Plaintiff is aware.

7. Did you consume any alcoholic beverages or take any drugs or medication within twelve hours before the time of the incident described in the complaint? If so, state the type and amount of alcoholic beverages, drugs or medication which were consumed and when and where you consumed them.

ANSWER: No.

8. Describe in detail how the incident described in the complaint happened, including all actions taken by you to prevent the incident.

ANSWER: On August 16, 2020, Plaintiff was driving westbound on SW 39th Street when the Defendant, Luis Manuel Mispireta, attempted to make a left-hand turn onto SW 39th Street from a side street/private driveway right in front of the Plaintiff's vehicle, thereby causing a collision. As a result of the collision, Plaintiff's vehicle was forced into a telephone pole and fence just off of the roadway.

9. Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question.

ANSWER: Plaintiff contends that the Defendant failed to maintain a proper lookout while driving, and otherwise failed to drive his vehicle in a reasonably safe manner.

10. Were you charged with any violation of law (including any regulations or ordinances) arising out of the incident described in the complaint? If so, what was the nature of the charge; what plea, or answer, if any, did you enter to the charge; what court or agency heard the charge; was any written report prepared by anyone regarding this charge, and if so, what is the name and address of the person or entity that prepared the report; do you have a copy of the report; and was the testimony at any trial, hearing or other proceeding on the charge recorded in any manner, and if so, what was the name and address of the person who recorded the testimony?

ANSWER: Yes. Driving with a suspended license without knowledge and failure to provide proof of insurance.

11. Describe each injury for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury, and, as to any injuries you contend are permanent, the effects on you that you claim are permanent.

ANSWER: As a result of the collision on August 16, 2020, Plaintiff sustained injuries to his neck, lower back, and head. Plaintiff required treatment to help alleviate his pain and discomfort. Ultimately, Plaintiff underwent surgical procedures on his neck

and lower back to help with the pain and discomfort (on 12/1/2020 and 9/20/2021). Unfortunately, even with the surgical procedures, Plaintiff continues to have pain and discomfort. These injuries have affected Plaintiff's normal daily activities.

12. List each item of expense or damage, other than loss of income or earning capacity, that you claim to have incurred as a result of the incident described in the complaint, giving for each item the date incurred, the name and business address to whom each was paid or is owed, and the goods or services for which each was incurred.

ANSWER: As a result of the collision on August 16, 2020, Plaintiff has incurred the following medical expenses for her care and treatment to date:

Facility/Provider	Address	Date of Service	Amount Billed
COR Injury Centers of Hollywood	3107 Stirling Road, Suite 206 Hollywood, FL 33312	August 19, 2020 - October 20, 2020	\$13,739.00
Spine and Orthopedic Specialist of South Florida, LLC.	3618 Lantana Road, Suite 100 Lake Worth, FL 33462	October 12, 2020 - October 1, 2021	\$170,462.80
Doral Medical Imaging	8181 NW 36 St. Suite 3 Doral, FL 33166	September 11, 2020	\$3,170.00
CMI Open MRI of Plantation	150 NW 70 AVE, Suite 1 Plantation, FL 33317	October 19, 2020 - April 22, 2021	\$5,550.00
COR Interventional Medicine	7000 W. Oakland Park Blvd, Suite 204 Sunrise, FL 33313	September 4, 2020	\$550.00
Anesthesia Services LLC	2031 Palm Beach Lakes Blvd, Suite 100 West Palm Beach, FL 33409	December 1, 2020 - September 20, 2021	\$14,580.00

Associates MD	4780 S.W. 64 Avenue, Suite 104 Davie, FL 33314	November 25, 2020 - August 27, 2021	\$5,114.88
Central Palm Beach Surgery Center, LLC.	2047 Palm Beach Lakes Blvd. West Palm Beach, FL 33409	December 1, 2020 - September 20, 2021	\$177,776.00
Ramon Vazquez, Jr., M.D., P.A.	3370 Burns Road Palm Beach Gardens, FL 33410	September 20, 2021	\$72,000.00

13. Do you contend that you have lost any income, benefits, or earning capacity in the past or future as a result of the incident described in the complaint? If so, state the nature of the income, benefits, or earning capacity, and the amount and the method that you used in computing the amount.

ANSWER: Yes. As a result of the procedures Plaintiff was required to undergo for the injuries he sustained in the subject collision, he missed approximately seven (7) months of work with Advanced Roofing. Plaintiff would rely on his income tax returns for the exact amount of money missed out on as a result. Plaintiff is willing to provide an executed authorization so that the information may be obtained.

14. Has anything been paid or is anything payable from any third party for the damages listed in your answers to these interrogatories? If so, state the amounts paid or payable, the name and business address of the person or entity who paid or owes said amounts, and which of those third parties have or claim a right of subrogation.

ANSWER: None known to Plaintiff.

15. List the names and business addresses of each physician who has treated or examined you, and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.

ANSWER: See Plaintiff's response to number 12 herein. For the specific injury or condition treated on each examination, please see the responsive medical records produced in response to requests for production.

16. List the names and business addresses of all other physicians, medical facilities or other health care providers by whom or at which you have been examined or treated in the past ten years; and state as to each the dates of examination or treatment and the condition or injury for which you were examined or treated.

ANSWER: Plaintiff currently recalls receiving medical care and treatment at the following facilities over the past ten (10) years. Plaintiff does not recall each and every visit specifically, or the date of each and every visit specifically. Plaintiff acknowledges that there may be dates and/or facilities not included below because Plaintiff does not currently recall.

Doctor Name	Address
Dr. Adrian Sagman	6890 Miramar Pkwy, Suite F Miramar, FL 33023
Memorial Regional Hospital	3501 Johnson Street Hollywood, FL 33021
Dr. Rahat Faderani	1600 S. Federal Hwy, Suite 640 Pompano Beach, FL 33062

17. List the names and addresses of all persons who are believed or known by you, your agents or attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.

ANSWER:

The medical providers listed in response to numbers 12 and 16 herein have knowledge of Plaintiff's medical care and/or condition before and/or after the subject incident.

Monique Malave


She was in the Plaintiff's vehicle at the time of the subject collision, and thus, may have knowledge of the subject collision, as well as knowledge of Plaintiff's physical and/or emotional condition before and after the subject collision.

Mariah Lee Montes


She was in the Plaintiff's vehicle at the time of the subject collision, and thus, may have knowledge of the subject collision, as well as knowledge of Plaintiff's physical and/or emotional condition before and after the subject collision.

**Andre Montes
4220 SW 71st Way
Davie, Florida 33314**

He was in the Plaintiff's vehicle at the time of the subject collision, and thus, may have knowledge of the subject collision, as well as knowledge of Plaintiff's physical and/or emotional condition before and after the subject collision.

**Damia Fletcher
1100 NW 1st Street
Dania Beach, FL 33004**

She was in the Plaintiff's vehicle at the time of the subject collision, and thus, may have knowledge of the subject collision.

**Isaiah Gissendanner
5212 Wiley Street
Hollywood, FL 33021**

He was in the Plaintiff's vehicle at the time of the subject collision, and thus, may have knowledge of the subject collision.

18. Have you heard or do you know about any statement or remark made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name and addresses of each person who made the statement or statements, the name and address of each person who heard it, and the date, time, place and substance of each statement.

ANSWER: After the collision occurred, Plaintiff and the Defendant exchanged words. At that time, the Defendant said "I'm sorry, I didn't see you."

19. Have you made an agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in this case? If so, state the terms of the agreement and the parties to it.

ANSWER: No.

20. Please state if you have ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter and if so, state whether you were plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

ANSWER: Yes, Plaintiff has been a named party to actions previously. See Plaintiff's response to number 5 herein. Additionally, Plaintiff was involved in a landlord/tenant issue in approximately 2016 in Broward County, as well as a divorce in 2003 in Miami-Dade County. Otherwise, Plaintiff does not recall.

21. State the name and address of every person known to you, your agents, or attorneys, who has knowledge about, or possession, custody or control of any model, plat, map, drawing, motion picture, video tape, or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.

ANSWER: Plaintiff's counsel is in possession of the photographs previously produced in response to requests for production.

VERIFICATION

STATE OF Florida)
)SS
COUNTY OF Broward)

LUIS CORTINA, being duly sworn, deposes and says that he/she verifies the foregoing answers to Plaintiff's Interrogatories, and swears under penalty of perjury that the foregoing answers are true and correct.

LC
Signature

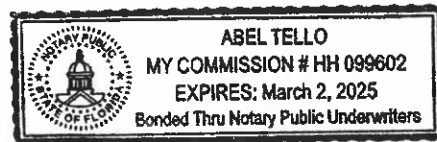
Luis Cortina
Print name

BEFORE ME, the undersigned authority, personally appeared Luis Cortina
who is personally known to me or who presented _____ as identification.

SWORN TO AND SUBSCRIBED before me this 11th day of April 2022.

NOTARY PUBLIC, STATE OF Florida

Print Name/Stamp Commissioned Name:



IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

CASE NO.: CACE-21-019815

v.

LUIS MANUEL MISPIRETA
and AMAZON.COM, INC.,

Defendants.

_____ /

DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES
TO PLAINTIFF'S COMPLAINT

Defendant, LUIS MANUEL MISPIRETA, hereby responds to Plaintiff's Complaint, and states:

1. The allegations of paragraph 1 of Plaintiff's Complaint are admitted for jurisdictional purposes only. Otherwise, the allegations of paragraph 1 of Plaintiff's Complaint are denied.

2. The Defendant is without knowledge regarding the allegations of paragraph 2 of Plaintiff's Complaint, therefore the allegations are denied.

3. Denied and strict proof demanded thereof.

4. The allegations of paragraph 4 of Plaintiff's Complaint are denied.

5. The Defendant is without knowledge regarding the allegations of paragraph 5 of Plaintiff's Complaint, therefore the allegations are denied and strict proof is demanded thereof.

6. The allegations of paragraph 6 of Plaintiff's Complaint are denied.

7. The Defendant is without knowledge regarding the allegations of paragraph 7 of Plaintiff's Complaint, therefore the allegations are denied.

**COUNT I — PLAINTIFF’S NEGLIGENCE CLAIM AGAINST
DEFENDANT, LUIS MANUEL MISPIRETA**

8. The allegations of paragraph 8 of Plaintiff’s Complaint are denied.
9. The allegations of paragraph 9 of Plaintiff’s Complaint are denied.
10. The allegations of paragraph 10 of Plaintiff’s Complaint are denied.

**COUNT II — PLAINTIFF’S VICARIOUS LIABILITY CLAIM AGAINST
DEFENDANT, AMAZON.COM, INC.**

11. The allegations of paragraph 11 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 11 are denied.

12. The allegations of paragraph 12 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 12 are denied.

13. The allegations of paragraph 13 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 13 are denied.

14. The allegations of paragraph 14 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 14 are denied.

15. The allegations of paragraph 15 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 15 are denied.

16. The allegations of paragraph 16 are not directed to this defendant, therefore no response is required. To the extent a response is required, the allegations of paragraph 16 are denied.

AFFIRMATIVE DEFENSES

1. Defendant affirmatively alleges that Plaintiff was negligent in failing to utilize available and operational seatbelts or safety devices, all of which directly and proximately resulted in the injuries and damages incurred, if any. Any recovery by the Plaintiff in this action must be reduced in accordance with her negligence as a matter of law.

2. At all times material hereto, Plaintiff was guilty of negligence in the operation and maintenance of the motor vehicle she was driving and such was the proximate cause of the accident. Any recovery by Plaintiff in this action must be reduced in accordance with Plaintiff's negligence.

3. Defendant affirmatively alleges that the injuries and damages sustained by Plaintiff, if any, fail to satisfy the mandates and requirements of §627.737(2), Florida Statutes, which are a condition precedent to recovery of certain damages in this action.

4. Defendant affirmatively alleges that it is entitled to a setoff of all collateral source benefits paid or payable to Plaintiff under the provision of §§627.736(3) and 768.76, Florida Statutes, or any other applicable statutes.

5. Defendant affirmatively alleges that any losses and damages sustained by Plaintiff was not the direct and proximate result of any actions of this Defendant but, instead, were the natural consequences of the acts of certain third parties and/or intervening cause. Defendant reserves the right to amend this affirmative defense to comply with *Messmer v. Teacher Insurance Co.*, 588 So.2d 610 (Fla. 5th DCA 1991) and *Fabré v. Martin*, 623 So.2d 1182 (Fla. 1993), upon continuing discovery. Defendant reserves the right, pursuant to *Nash v. Wells Fargo Guard Services, Inc.*, 678 So.2d 1262 (Fla. 1996), to specifically identify any other person or entity that discovery discloses is or may be liable for part or all of Plaintiff's claims.

6. If at the time of the accident sued upon, Plaintiff had health insurance or benefits which have covered all or a part of her bills, and which would have resulted in reductions in the amounts which would have to be repaid to their health care providers, per Florida case law, and Plaintiff failed to mitigate damages by choosing medical providers who would accept her health insurance or benefits, then Plaintiff should not be entitled to recover any damages which would have been avoided had they mitigated same by choosing health care providers who would have taken his insurance or benefits, which would have resulted in reductions of amount due.

7. Defendant affirmatively alleges Plaintiff is subject to a deductible in her personal injuries protection benefits and has no right to claim or recover those amounts from the Defendant pursuant to §627.739(1), Florida Statutes.

8. Defendant affirmatively alleges Plaintiff failed to mitigate the damages she alleges to have suffered in Plaintiff's Complaint by failing to comply with medical advice, failing to seek medical treatment timely or by failing to provide medical providers true and accurate information about her condition.

9. Defendant specifically reserves its right to amend and plead any and all Affirmative Defenses that may become known to him during the course of discovery.

DEMAND FOR JURY TRIAL

Defendants demand a trial by a jury on all issues.

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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 21st day of April, 2022, a true and correct copy of the above and foregoing document was filed with the Clerk of the above styled Court using eFiling Portal. We also certify that the foregoing document was served this day on all counsel of record or pro se parties identified on the attached Service List via electronic mail or in some other authorized manner for those counsel or parties who are not authorized to receive filings by electronic mail.

Respectfully submitted,

***WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP***
*Counsel for Defendants, Amazon.com, Inc.
and Luis Manuel Mispireta*
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EXHIBIT “C”

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.: CACE-21-019815 DIV: 02

**PLAINTIFF'S NOTICE OF SERVING VERIFIED ANSWERS TO DEFENDANT, AMAZON.COM, INC.'S
FIRST SET OF INTERROGATORIES DATED DECEMBER 1, 2021**

COMES NOW, the Plaintiff, **Luis Carlos Cortina**, by and through the undersigned attorney,
and hereby files his answers to Defendant, **Amazon.com, Inc.'s** First Set of Interrogatories dated
December 1, 2021.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically
submitted on this 15th day of February 2022 to: Steven C. Jones, Esq., Anthony P. Strasius;
WILSON, ELSER, MOSKOWITZ EDELMAN & DICKER LLP Counsel for Defendant, AMAZON.COM
SERVICES, INC., 100 SE Second Street, Suite 2100 Miami, Florida 33131;
Anthony.strasius@wilsonelser.com; Steven.jones@wilsonelser.com.

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By: /s/ Jordan Kirby
Jordan Kirby

CACE-21-019815 DIV: 02

Florida Bar No.: 67217

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and AMAZON.COM, INC.,

CIVIL DIVISION

Defendants.

CASE NO.: CACE-21-019815 DIV: 02

**PLAINTIFF'S NOTICE OF SERVING VERIFIED ANSWERS TO DEFENDANT, AMAZON.COM, INC.'S
FIRST SET OF INTERROGATORIES DATED DECEMBER 1, 2021**

COMES NOW, the Plaintiff, **Luis Carlos Cortina**, by and through the undersigned attorney,
and hereby files his answers to Defendant, **Amazon.com, Inc.'s** First Set of Interrogatories dated
December 1, 2021.

CERTIFICATE OF SERVICE

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WILSON, ELSER, MOSKOWITZ EDELMAN & DICKER LLP Counsel for Defendant, AMAZON.COM
SERVICES, INC., 100 SE Second Street, Suite 2100 Miami, Florida 33131;
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By: /s/ Jordan Kirby

Jordan Kirby

CACE-21-019815 DIV: 02

Florida Bar No.: 67217

**PLAINTIFF'S VERIFIED ANSWERS TO DEFENDANT'S
AMAZON.COM, INC.'S FIRST SET OF INTERROGATORIES DATED DECEMBER 1, 2021**

1. Please describe in detail the society, services, consortium and companionship which your spouse rendered to you in the year prior to the date of the accident complained of.

ANSWER: Not applicable. Plaintiff is not married.

2. If you contend your spouse has failed to provide society, services, consortium, and companionship mentioned in your answer to the preceding interrogatory, please state in detail why your spouse has failed to provide the same since the date of the accident described in the Complaint.

ANSWER: Not applicable.

3. State the date and place of your marriage.

ANSWER: Not applicable.

4. List all of Plaintiff's former name(s) and when you were known by those name(s). State all addresses where you have lived for the past ten years, the dates you lived at each address, your Social Security number, your date of birth.

ANSWER:

Plaintiff has not been known by any other names.

Addresses:

[REDACTED]

Social Security Number: [REDACTED]

Date of birth: [REDACTED]

5. If you have ever been previously married, please state the name and present address of your former spouse; the date and place of each previous marriage; how said marriages were terminated (i.e., death, divorce, etc.); and the date on which each was terminated.

ANSWER: Plaintiff was previously married to Melby Cortina. Plaintiff is unaware of her present address. They were married in the mid-1990's in Dade County. The marriage was ended in divorce in 2002/2003 in Dade County.

6. If any prior marriage has ended in divorce, please state the case style, case number, jurisdiction and date of dissolution.

ANSWER: Melby Yohana Cortina v. Luis Carlos Cortina. Case number 2002-018333-FC-04. Dade County. Final judgment in May 2003.

7. State whether or not you have individually or as a couple retained the services of a marriage counselor or if you have sought counseling through your pastor or any other type of marriage counseling organization. If so, state the name, address, and telephone number of such pastor or marriage counseling organization.

ANSWER: None.

8. Have you ever been separated? If so, please state when, how long, and the reason for each such separation.

ANSWER: Not applicable.

9. Does your spouse work? If so, please state your spouse's income, what portion of that income is contributed to the family income, and name and address of your spouse's employment.

ANSWER: Not applicable.

10. Has your spouse been unemployed at any time within the last five years for reasons unrelated to this accident or incident? If so, please state the dates and reasons for each period of unemployment.

ANSWER: Not applicable.

11. Are you suffering from any disabilities, illnesses or infirmities? If so, please state the disabilities, illnesses or infirmities, and names, addresses, and telephone numbers of any treating physicians or health care providers.

ANSWER: None other than the injuries that Plaintiff has sustained as a result of the subject incident.

12. As a result of the injuries alleged in your complaint, has it been necessary for you to hire outside help to complete jobs or render services your injured spouse is unable to do? If so, please describe the jobs and services, and give the names, addresses and telephone numbers of the persons rendering such services.

CACE-21-019815 DIV: 02

ANSWER: Not applicable.

COMPOSITE EXHIBIT “D”

TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS
DISTRITO SUR DE FLORIDA
DIVISIÓN DE FORT LAUDERDALE

N.º DE CASO

LUIS CARLOS CORTINA,

Demandante

v.

LUIS MANUEL MISPIRETA y
AMAZON.COM, INC.,

Demandados.

_____ /

DECLARACIÓN DE LUIS MANUEL MISPIRETA

1. Mi nombre es Luis Manuel Mispireta.
2. Soy mayor de 18 años y tengo conocimiento personal de los hechos expuestos en este documento.
3. Resido en 508 Briarwood Drive. Charlotte, North Carolina. He residido en Carolina del Norte desde septiembre de 2021, aproximadamente.
4. Soy ciudadano del estado de Carolina del Norte.
5. Declaro bajo pena de perjurio que lo anterior es verdadero y correcto.

Celebrado el 04-21 de 2022.

A handwritten signature in black ink, appearing to read "Luis M. Mispireta", written over a horizontal line.

Firma del Demandado, LUIS MANUEL MISPIRETA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO.

LUIS CARLOS CORTINA,

Plaintiff,

v.

LUIS MANUEL MISPIRETA and
AMAZON.COM, INC.,

Defendants.

DECLARATION OF LUIS MANUEL MISPIRETA

1. My name is Luis Manuel Mispireta.
2. I am over 18 years of age and have personal knowledge of the facts set forth herein.
3. I reside at 508 Briarwood Drive. Charlotte, North Carolina. I have resided in North Carolina since approximately September 2021.
4. I am a citizen of the State of North Carolina.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04-21, 2022.

A handwritten signature in black ink, appearing to read "Luis M. Mispireta", written over a horizontal line.

Signature of Defendant, LUIS MANUEL MISPIRETA



TRANSLATION CERTIFICATION

I, Leonardo Duran, General Manager of Language Services for and on behalf of Magna Legal Services, hereby certify that the attached document identified as:

- DECLARATION OF LUIS MANUEL MISPIRETA (Case: Luis Carlos Cortina v. Luis Manuel Mispireta and Amazon.com, Inc.)

was translated from English to Spanish by a professional translator competent in both English and Spanish to render such a translation, and that to the best of our knowledge, ability, and belief this translation is a true, accurate, and complete translation of the original English document.

A handwritten signature in black ink, appearing to read "Leonardo Duran", is written over a horizontal line.

Leonardo Duran

April 20, 2022

Date